

JUDGE PHILIP MARTINEZ

FILED

2014 AUG 27 PM 12: 22

CLEAR U.S. DISTRICT COURT
14 CR-
BY _____ DEPUTY

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

JOEL MORENO (2),
a.k.a. Joel Flores; :

Defendants.

§ CRIMINAL NO. 17P-14-CR

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SEALED

INDICTMENT

CT 1: 21:846 & 841(a)(1) -

Conspiracy to Possess with Intent to Distribute a Controlled Substance

CTS 2-11: 21:841(1)(1) - Possession of a Controlled Substance with Intent to Distribute

EP14CR1611

THE GRAND JURY CHARGES:

COUNT ONE

(21 U.S.C. §§ 846 & 841(a)(1))

That on or about January 29, 2013, and continuing to and including on or about July 31, 2014, in the Western District of Texas, Defendants,

**JOEL MORENO (2),
a.k.a. Joel Flores; :**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together with others to the Grand Jury known and unknown, to commit offense against the United States, in violation of Title 21, United States Code, Section 846, that is to say they conspired to possess a controlled substance, which offense involved cocaine, a Schedule II Controlled Substance, with intent to distribute same, contrary to Title 21, United States Code, Sections 841(a)(1) in the quantities set forth below:

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

The quantity of the mixture or substance containing cocaine involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

| DEFENDANT | QUANTITY | STATUTE |
|-----------------|---|------------------------------|
| | 500 grams or more of a mixture or substance containing a detectable amount of cocaine | 21 U.S.C. § 841(b)(1)(B)(ii) |
| JOEL MORENO (2) | 500 grams or more of a mixture or substance containing a detectable amount of cocaine | 21 U.S.C. § 841(b)(1)(B)(ii) |
| | 500 grams or more of a mixture or substance containing a detectable amount of cocaine | 21 U.S.C. § 841(b)(1)(B)(ii) |

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

(21 U.S.C. § 841(a)(1))

That on or about February 20, 2013, in the Western District of Texas, Defendants,

**JOEL MORENO (2),
a.k.a. Joel Flores;**

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE
(21 U.S.C. § 841(a)(1))

That on or about February 28, 2013, in the Western District of Texas, Defendants,

JOEL MORENO (2),
a.k.a. Joel Flores;

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR
(21 U.S.C. § 841(a)(1))

That on or about March 13, 2013, in the Western District of Texas, Defendants,

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE
(21 U.S.C. § 841(a)(1))

That on or about May 9, 2013, in the Western District of Texas Defendants,

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX
(21 U.S.C. § 841(a)(1))

That on or about June 13, 2013, in the Western District of Texas, Defendants,

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVEN

(21 U.S.C. § 841(a)(1))

That on or about July 23, 2013, in the Western District of Texas, Defendants,

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHT

(21 U.S.C. § 841(a)(1))

That on or about May 19, 2014, in the Western District of Texas, Defendant,

JOEL MORENO (2),

a.k.a. Joel Flores,

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINE
(21 U.S.C. § 841(a)(1))

That on or about June 3, 2014, in the Western District of Texas, Defendant,

JOEL MORENO (2),
a.k.a. Joel Flores,

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TEN
(21 U.S.C. § 841(a)(1))

That on or about July 18, 2014, in the Western District of Texas, Defendants,

JOEL MORENO (2),
a.k.a. Joel Flores,

knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ELEVEN
(21 U.S.C. § 841(a)(1))

That on or about July 31, 2014, in the Western District of Texas, Defendants,

JOEL MORENO (2),
a.k.a. Joel Flores,

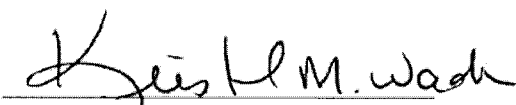
knowingly and intentionally possessed with intent to distribute a controlled substance, which offense involved a quantity of a mixture or substance containing a detectable amount of cocaine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

A TRUE BILL ORIGINAL SIGNATURE
REDACTED PURSUANT TO
E-GOVERNMENT ACT OF 2002

FOREPERSON OF THE GRAND JURY

ROBERT PITMAN
UNITED STATES ATTORNEY

BY:


Assistant U.S. Attorney